

# Exhibit 2

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In Re: Methyl Tertiary Butyl Ether  
("MTBE") Products Liability Litigation

Master File No. 1:00-1898 (VSB)

**This document relates to:**

MDL 1358

*Commonwealth of Pennsylvania v. Exxon  
Mobil Corporation, et al.*

Case No. 14-cv-06228

**AFFIDAVIT OF RACHEL B. HAIG IN SUPPORT OF MOTION FOR ADMISSION  
PRO HAC VICE**

RACHEL B. HAIG, being duly sworn, deposes and states under oath: I am an attorney with the law firm Kirkland & Ellis LLP, and counsel to Defendants Atlantic Richfield Company, BP America Inc., BP Amoco Chemical Company, BP Holdings North America Limited, BP p.l.c., BP Products North America, Inc., and BP West Coast Products LLC in the above-captioned action.

I have never been convicted of a felony and I have never been censured, suspended, disbarred, or denied admission or readmission by any court. I am not the subject of any present or past disciplinary proceedings in this or any court.

I am a member in good standing of the Bar of the State of Illinois, am experienced in Federal practice, and am familiar with the Federal Rules of Civil Procedure.

Executed on October 7, 2020

  
Rachel B. Haig, IL Bar No. 6312972

Sworn to before me this 7th day of October, 2020.

  
Notary Public

